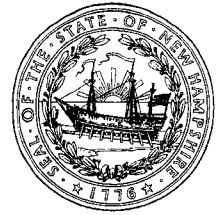




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

March 3, 2006

**CERTIFIED MAIL # 7000 0600 0023 9933 9733**  
**RETURN RECEIPT REQUESTED**

**Letter of Deficiency**  
**No. WMD-06-004**

John Leigh, Plant Manager  
Mary Hitchcock Memorial Hospital  
One Medical Center Drive  
Lebanon, NH 03756

**SUBJECT: Compliance Deficiencies-Mary Hitchcock Memorial Hospital, Infectious  
Waste Facility, Lebanon, New Hampshire, DES-SW-LP-95-510**

Dear Mr. Leigh:

On February 15, 2006 New Hampshire Department of Environmental Services (DES), Waste Management Division ("Department") conducted an inspection of the Mary Hitchcock Memorial Hospital, Infectious Waste Facility ("facility") in Lebanon, New Hampshire. The purpose of the inspection was to determine compliance with Solid Waste Permit #DES-SW-LP-95-510, RSA 149-M, and rules adopted thereto relative to the proper management of solid waste.

During the inspection, Department personnel learned or observed the following:

1. Currently there are no certified Solid Waste Operators registered at your facility.
2. The infectious storage areas were easily assessable to unauthorized personnel. Department staff were able to access infectious waste in unlocked biological waste containers by going through unlocked, outside doors at your facility.
3. Solid, biological, autoclaveable, infectious and chemotherapy waste are all placed together in blue carts which are located throughout the facility prior to being transported to the waste handling room to be separated. This practice could lead to the contamination of noninfectious waste by infectious waste should a spill occur, requiring contaminated bags to be treated as infectious waste. Commingling of the infectious and solid waste in the same storage container prior to disposal poses a danger to workers handling the wastes.
4. No current operating plan was available at the facility in the waste handling room. After a file review at DES no operating plan, containing the current handling procedures for the waste was found.

This letter serves to inform you that from observations and information obtained during the inspection, facility conditions constitute violations of RSA 149-M and the rules adopted pursuant thereto, specifically:

- |                  |  |
|------------------|--|
| Env-Sw 3303.01   | All solid waste facility operators shall be certified by the department for the level of his/her responsibilities  |
| Env-Sw 904.02(g) | Requires access to on-site storage areas for infectious waste be limited to authorized persons.  |
| Env-Sw 904.03(c) | Infectious waste shall not be combined or mixed with other waste prior to disposal, unless authorized by the receiving disposal facility.                      |
| Env-Sw 315.03(a) | Before making a modification to the operation of a facility as permitted by the department, the permittee shall obtain written approval for such modifications |

The Department believes that the cited deficiencies can be corrected by completing the following requested actions within the time indicated:

1. **Within 7 days of** the date of this letter, call David Degler, DES Solid Waste Operator trainer at 271-2928 to discuss the arrangements for certification. After obtaining their operator certifications through the DES Solid Waste Operator Certification Program the facility may request to continue annual training by reciprocity, in accordance with Env-Wm 3303.06.
2. **Within 14 days of** the date of this letter, all infectious waste storage carts should be stored and locked to prevent unauthorized access.
3. **Within 14 days of** the date of this letter, infectious waste should be handled separately prior to disposal by placing it in separate, locked, individually marked containers.
4. **Within 30 days of** the date of this letter, submit a written operating plan outlining waste handling procedures for your infectious waste, from point of generation to final disposal. Spill prevention and clean up, incident reporting, as well as corrective actions taken should be included in this plan.

Please address all correspondence and reports regarding this matter to:

Melanie Wheeler, Waste Management Specialist  
Department of Environmental Services  
P.O. Box 95  
Concord, NH 03302-0095  
Fax: (603) 271-2456

In the event each compliance action is not achieved within the time period indicated above, the Department may initiate formal enforcement action against the facility including issuing an order requiring the deficiencies to be corrected and/or referring the matter to the New Hampshire Department of Justice for imposition of civil and/or criminal penalties. The Department reserves the right to pursue administrative fines for the violation(s) of the above.

Your prompt cooperation is appreciated. Please contact Melanie Wheeler of the Solid Waste Management Bureau at 271-2927, if you have any questions or need further assistance.

Sincerely,



Michael Guilfooy, P.E.  
Administrator  
Solid Waste Management Bureau  
Tel: (603) 271-2925  
Fax: (603) 271-2456  
E-Mail: mguilfooy@des.state.nh.us

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cc: Anthony P. Giunta, P.G., Director, WMD  
Paul Heirtzler, Administrator, WMD  
Gretchen R. Hamel, Legal Unit Administrator

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